

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

In re:

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CLIFFORD C WONG  
ADEBESSI CHARLES WONG

\* Case No.: 15-19543  
\* Chapter 7

Debtors

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**DEBTOR'S MOTION TO CONVERT TO CHAPTER 13**

NOW COMES, the Debtor, Clifford & Adebessi Wong, by and through her counsel, Robert K. Goren and Goren, Wolff & Orenstein, LLC, who files this Motion To Convert To Chapter 13. As grounds therefore, the Debtor states as follows:

1. On July 8, 2015, the above-named Debtors filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code.
2. After discussion with the Office of the U.S. Trustee, Debtors are willing to convert their case to Chapter 13 and attempt in good faith a Chapter 13 Plan.
3. This case has not been previously converted or dismissed.

WHEREFORE, the Debtors pray that this Motion to Convert To Chapter 13 be granted.

Respectfully submitted,

GOREN, WOLFF & ORENSTEIN, LLC.

Date: September 29, 2015

/s/Robert K. Goren

Robert K. Goren, Esq. (03153)

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